

KRANJAC TRIPODI & PARTNERS LLP

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August 4, 2022

Via ECF

Hon. Leda Dunn Wettre, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Manetta, et al. v. Navient Corporation, et al.
Case No. 2:20-cv-07712-SWD-LDW

Dear Judge Wettre:

This firm represents Plaintiffs in the referenced matter. Pursuant to Your Honor's June 28, 2022 Order [ECF No. 68], we hereby submit this concise status letter in advance of the August 11, 2022 status conference before Your Honor.

Pursuant to Your Honor's June 28, 2022 Order, Plaintiffs served Defendants with amended document demands on July 8, 2022. Also on July 8, 2022, Plaintiffs served Defendants with a Rule 30(b)(6) deposition notice for purposes of identifying the scope and nature of documents in Defendants' possession, so as to properly tailor/limit Plaintiffs' document demands. The Rule 30(b)(6) deposition was noticed for August 12, 2022; however, due to Defendants' corporate representative's schedule and availability, that deposition has been rescheduled for September 28, 2022.

In addition, on August 1, 2022, counsel participated in a meet and confer regarding certain objections by Defendants to Plaintiffs' amended discovery demands. Those objections included certain of Plaintiffs' requests for "all documents" related to certain issues and aspects of Defendants' servicing of loans, including the manner in which payments are allocated towards (i) principal versus interest and (ii) different loans.¹ Without waiving their right to seek documents

¹For example, Plaintiffs' amended requests include the following:

All documents related to the claims and/or Defendants' defenses thereto as identified in Instruction 25, including correspondence, regarding any analysis, determination, investigation, strategy, policy, directive, and/or decision by Defendants concerning the manner by which payments by a student loan borrower are allocated by Defendants towards principal versus interest (whether past, present, or future).

All documents related to the claims and/or Defendants' defenses thereto as identified in

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related to those specified issues, in an effort to compromise and further limit the scope of documents sought from Defendants, Plaintiffs proposed that they first complete the noticed 30(b)(6) deposition to identify the specific nature and scope of documents in Defendants' possession that are responsive to their amended demands. Once complete, Plaintiffs would be in a position to discuss further limiting the scope of documents sought in their amended requests, as directed by Your Honor. Defendants agreed with this proposal and Plaintiffs intend to proceed in that manner, if acceptable to Your Honor.

Finally, the last deposition of the named Plaintiffs, Matthew Markosian, has been scheduled for September 22, 2022. Defendants have also served deposition subpoenas on two non-party witnesses, Maulik Sanghavi and Michelle Sanghavi, which depositions are currently scheduled for September 12 and 13, 2022.

Respectfully submitted,

s/ Xavier M. Bailliard

Xavier M. Bailliard

cc. All counsel of record (via ECF)

Instruction 25, including correspondence, regarding any analysis, determination, investigation, strategy, policy, directive, and/or decision by Defendants concerning the manner by which payments by a student loan borrower are allocated by Defendants to different types and/or programs of loans.